REMARKS

Upon entry of the present amendments, claims 1-82 will be currently pending in the subject application. Claims 1-78 have been amended, claims 10-16, 25-29, 38-42, 44-50, and 55-78 have been withdrawn, and new claims 79-82 have been added as shown on pages 2-16 of the Reply. No new matter has been added.

Applicants' representative thanks Examiner Pham for the courtesies extended during the telephonic interview conducted on August 19, 2011, during which the proposed claim amendments were discussed. The Examiner recommended minor clarifying amendments, and, although no immediate agreement regarding allowance was reached, the Examiner indicated that such amendments would more clearly distinguish the present claims from cited references Farrell, *et al.* and Yaksich, *et al.*, necessitating additional search and consideration.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   Elections/Restrictions

On page 2 of the Office Action, the Examiner indicates that claim 43 is directed toward elected Species B (FIG. 12), but also states that claim 43 is withdrawn from consideration as being directed toward a non-elected species. For the purposes of this response, it is assumed that the Examiner intended to maintain claim 43 for prosecution.

II.   Rejection of Claims 1-9, 17-24, 30-37, 43, and 51-54 Under 35 U.S.C §103

Claims 1-9, 17-24, 30-37, 43, and 51-54 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Farrell, *et al.* (US 7,717,841) in view of Yaksich, *et al.* (US 5,563,999). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all elements set forth in the subject claims.

> To reject claims in an application under § 103, an examiner must establish a
> prima facie case of obviousness. A prima facie case of obviousness is established
> by a showing of three basic criteria. First, there must be some apparent reason to
> combine the known elements in the fashion claimed by the patent at issue (*e.g.*, in
> the references themselves, interrelated teachings of multiple patents, the effects of

demands known to the design community or present in the marketplace, or in the knowledge generally available to one of ordinary skill in the art). To facilitate review, this analysis should be made explicit. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 706.02(j). See also KSR Int'l Co. v. Teleflex, Inc., 550 U.S. 398, 04-1350, slip op. at 14 (2007). The reasonable expectation of success must be found in the prior art and not based on applicant's disclosure. See In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)

Amended independent claim 1 recites, *a processor configured to receive first input that selects an item to be printed and second input that **selects an event from a menu of events relating to activity in a sales management database**; and storage configured to store an event rule that relates the event and the item, wherein the processor is configured to **automatically generate a print order relating to the item in response to occurrence of the event**.*

Farrell, *et al.* does not disclose or suggest at least these aspects. Farrell, *et al.* relates to a job processing method that allows an operator of an electronic reprographic system to select deferred actions for inactive print jobs which are automatically initiated upon the detection of a specific triggering event. According to Farrell, *et al.*, the job processing instruction set associated with the inactive job is implemented as soon as system resources are available after detection and identification of the triggering event, which can be one of a predetermined set of system operating conditions (see Abstract).

However, Farrell, *et al.* is silent with regard to a processor configured to receive input that *selects an event from a menu of events relating to activity in a sales management database,* and to *automatically generate a print order relating to the item in response to occurrence of the event.* Arguing that Farrell, *et al.* discloses such events, the Office Action notes in particular the aforementioned trigger events, described at columns 6-10 of Farrell, *et al.* However, describing these triggering events at column 6, lines 45-54, Farrell, *et al.* states:

"When these triggering events occur, the automatic action specified by the operator will be performed. Some examples of triggering events include, for example: *date and time (specified in relative or absolute terms); resource availability (i.e., availability of resources such as, for example, print queues, cartridge tape drives, modems, file servers, finishing devices, fonts, etc.);*

operator logoff; operator logon; receipt or creation of a specified second print job; system transition to a quiescent state; etc." (emphasis added)

The Examiner also indicates column 9, lines 9-10, which merely states that "the system will carry out the selected deferred actions on the inactive print job upon the occurrence of the *preselected system operating condition* that acts as a trigger for processing the inactive print job" (emphasis added).

None of these indicated triggering events described in Farrell, *et al.* relate to *activity in a sales management database*, or indeed activity in a database in general. Consequently, Farrell, *et al.* is silent with regard to *a processor configured to receive first input that selects an item to be printed and second input that **selects an event from a menu of events relating to activity in a sales management database**; and a storage configured to store an event rule that relates the event and the item, wherein the processor is configured to **automatically generate a print order relating to the item in response to occurrence of the event**.*

Yaksich, *et al.* does not cure these deficiencies. Yaksich, *et al.* relates to a forms automation system in which a central library facility functions as a central repository for business forms in electronic format. These forms are distributed to specified use locations by the central library depending upon the needs of the various use locations (see Abstract). However, like Farrell, *et al.*, Yaksich, *et al.* fails to disclose or reasonably suggest *a processor configured to receive first input that selects an item to be printed and second input that **selects an event from a menu of events relating to activity in a sales management database**; and a storage configured to store an event rule that relates the event and the item, wherein the processor is configured to **automatically generate a print order relating to the item in response to occurrence of the event**.*

Similarly, amended independent claim 7 recites, *selecting, via a first display region, an item that contain information from a sales management database; selecting, via a second display region, **an event relating to a change in the sales management database**; and **automatically generating a print order for the item in response to detecting occurrence of the event**.* Farrell, *et al.* and Yaksich, *et al.* are silent regarding at least these aspects, as discusses *supra.*

Likewise, amended independent claim 9 recites, *a first display region configured to*

*display an item to be printed; and a second display region configured to display **a menu of*** ***events for occurrence in a sales management database**, wherein, **in response to occurrence of*** ***an event selected from the menu of events, a print order is automatically generated**.* As noted above, the cited references do not disclose or suggest at least these elements.

Also, amended independent claim 17 recites, *displaying a **list of events relating to a*** ***change in a sales management database**; receiving a selection of an event from the list of events; displaying a list of items **to be automatically imaged in response to occurrence of at least*** ***one of the events**; receiving a selection of an item of the list of items; and storing the event and the item.* Neither Farrell, *et al.* nor Yaksich, *et al.* disclose or suggest at least these aspect, as noted *supra*.

Amended independent claim 30 recites, *displaying **a list of events capable of occurring*** ***in a sales management database**; receiving a selection of an event of the list of events; displaying a list of items **capable of being imaged in response to occurrence of at least one event*** ***of the list of events**; receiving a selection of an item of the list of items; and storing the event and the item.* As discussed above, the cited references are silent regarding at least these aspects.

Moreover, amended independent claim 43 recites, *a display having a first display region configured to display an item to be printed and a second display region configured to display **a menu of events associated with activity in a sales management database**; a processor configured to receive input that selects the item to be printed and an event from the menu of events; a storage component configured to store an event rule relating the event and the item, wherein, in **response to occurrence of the event, a print order relating to the*** ***item is automatically generated**.* Neither Farrell, *et al.* nor Yaksich, *et al.* disclose or suggest at least these elements, as noted above.

In addition, amended claim 18 recites, ***automatically generating a print order in*** ***response to occurrence of the event in the sales management database**, the print order including an indication that the item is to be imaged,* and amended claim 31 recites, ***automatically generating a print order in response to occurrence of the event in the sales*** ***management database**, the print order including an indication that the item is to be imaged.* As discussed supra, the cited reference are silent regarding at least these aspects.

Also, amended claim 2 recites, *the event comprises at least one of a new contact being added to the sales management database or a change to the sales management database*

indicative of a contact rising to a new status level. As discussed above, Farrell, *et al.* and Yaksich, *et al.* are silent with regard to *a processor configured to receive first input that selects an item to be printed and second input that **selects an event from a menu of events relating to activity in a sales management database***; *and a storage configured to store an event rule that relates the event and the item, wherein the processor is configured to **automatically generate a print order relating to the item in response to occurrence of the event**.* It therefore follows that the cited references also fail to disclose or suggest, more specifically, that such an event can comprise *at least one of a new contact being added to the sales management database or a change to the sales management database indicative of a contact rising to a new status level.* With regard to these aspects, the Office Action indicates the "updated/new customer profiles" described in Yaksich, *et al.* Describing the functionality of these customer profiles at column 6, line 58 – column 7, line 7, Yaksich, *et al.* states:

> "The FAP [forms automation platform] 14 also converts the display images to appropriate print formats based upon the distribution profile specified for each form. This is typically done right in the forms design package 38 itself (*e.g.*, in PERFORM). The operator inputs what printer formats the form is to be provided in, and the package 38 does the necessary formatting (either single or multiple). That is, if a form is to be distributed at a first location having a first printer with a first printer format, and to a second geographically remote user location, having a second printer with a second printer format (*e.g.*, a different manufacturer for the second printer than the first printer), the display images must be converted to print formats for both the first and second printers. That is, the same electronic business form will exist in different formats. The print image files will be validated for existence, *having been previously formatted based upon the customer profile*, and downloaded to the CLF [central library facility] 12." (emphasis added)

In addition, column 47, lines 26-27 of Yaksich, *et al.* states that "[t]he customer profile contains all relevant information about the customer." However, although page 4 of Office Action indicates generally that these customer profiles can be "updated" or made "new," this

does not disclose or reasonably suggest a processor configured to *automatically generate a print order relating to an item in response to occurrence of an event*, wherein the event comprises *at least one of a new contact being added to a sales management database or a change to the sales management database indicative of a contact rising to a new status level*.

Similarly, amended claim 8 recites, *designating the change to be at least one of a new contact being added to the sales management database or a change to a data field or a table in the sales management database indicative of a contact rising to a new level of contact*. The cited references are silent regarding at least these elements, as noted above.

Also, new claim 81 recites, *the detecting the occurrence of the event includes monitoring at least one of a data field or a data table of the sales management database*. Neither Farrell, *et al.* nor Yaksich, *et al.* contemplate monitoring at least one of a data field or a data table of a sales management database for any purpose, much less to detect occurrence of an event as described above.

In view of at least the foregoing, it is respectfully submitted that Farrell, *et al.* and Yaksich, *et al.*, individually or in combination, do not disclose or suggest all elements of amended independent claims 1, 7, 9, 17, 30, and 43 (and all claims depending there from), and as such fail to render obvious the present application. It is therefore requested that this rejection be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [VIMGP111US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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